

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

Cr. No. 10-CR-321  
(Hon. Thomas J. McAvoy)

-vs-

RICHARD ENRIQUE ULLOA,

Defendant.

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**VOIR DIRE REQUESTS OF THE UNITED STATES**

The United States requests that the Court ask potential jurors the following additional questions:

1. This case involves an allegation of economic or financial crime. Do any of you believe that economic crimes, such as fraud, are any less serious than other types of criminal offenses? Do any of you have a personal opinion or belief that economic crimes should be treated differently than other types of crime?

2. Have any of you, your relatives or close friends, worked in the financial services industry? If so, will you be able to base your verdict only on the evidence in this case, and on the law as I instruct you? Although your life experiences and common sense are valuable to assist you in your deliberations and in rendering a verdict, can you assure me, the Government, and these defendant that if selected as a juror, you will not act as an unsworn expert witness in the jury room during your deliberations?

3. Have any of you ever failed to file income tax returns?

4. Do you understand that if you are selected as a juror, it is your responsibility to follow this Court's instructions as they relate solely to the Defendant named in this particular case?

5. If you find that you disagree with the law, which I gave to you to apply, would you

have any difficulty nonetheless applying that law and reaching a verdict in this case?

6. Can you assure both sides in this case, that is both the Government and the defendant, that if you are selected as a juror, you will be completely fair and impartial, and will decide this case only on the facts and the law presented to you in this courtroom, without consideration of sympathy, bias, prejudice, or outside influence of any kind?

7. As a juror, you, in essence, sit in judgment of other people. Would any of you find it so difficult or uncomfortable, for any reason, including religious reasons, to sit in judgment of another human being that you could not be a fair and effective juror?

Dated: December 14, 2010

Respectfully submitted,

RICHARD S. HARTUNIAN  
United States Attorney  
Northern District of New York

/s/ Thomas A. Capezza

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